

EXHIBIT 3

From: Wayne S. Karbal

Sent: Tuesday, August 8, 2023 6:26 PM

To: Koss, Kelly <Kelly.Koss@btlaw.com>; Charles Browning <cbrowning@plunkettcooney.com>; Howard J. Fishman <hfishman@KARBALLAW.COM>

Cc: Dreher, Kevin <KDreher@btlaw.com>; Rivera, Ren <KMinnick@plunkettcooney.com>; Winters, Patrick <PWinters@plunkettcooney.com>; Drew Block <dblock@plunkettcooney.com>; Seth Jaffe <sjaffe@hww-law.com>; Brent J. Graber <bgraber@hww-law.com>; Stephanie Brochert <sbrochert@plunkettcooney.com>; Moyer, Bradford <BMoyer@plunkettcooney.com>; Hinton, Haley <Haley.Hinton@btlaw.com>; Wilhoit, Kathryn <Kathryn.Wilhoit@btlaw.com>; Kyureghian, Alice <AKyureghian@btlaw.com>; Naccachian, Nora <Nora.Naccachian@btlaw.com>


Subject: RE: Wolverine v. The Travelers Indemnity Company


Folks –


Please be sure to add Howard Fishman to your e-mail lists for First State. Thanks

Howard J. Fishman

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From: Koss, Kelly <Kelly.Koss@btlaw.com>

Sent: Tuesday, August 8, 2023 4:33 PM

To: Charles Browning <cbrowning@plunkettcooney.com>

Cc: Dreher, Kevin <KDreher@btlaw.com>; Rivera, Ren <KMinnick@plunkettcooney.com>; Winters, Patrick <PWinters@plunkettcooney.com>; Drew Block <dblock@plunkettcooney.com>; Seth Jaffe <sjaffe@hww-law.com>; Brent J. Graber <bgraber@hww-law.com>; Wayne S. Karbal <wkarbal@KARBALLAW.com>; Stephanie Brochert <sbrochert@plunkettcooney.com>; Moyer, Bradford <BMoyer@plunkettcooney.com>; Hinton, Haley <Haley.Hinton@btlaw.com>; Wilhoit, Kathryn <Kathryn.Wilhoit@btlaw.com>; Kyureghian, Alice <AKyureghian@btlaw.com>; Naccachian, Nora <Nora.Naccachian@btlaw.com>

Subject: RE: Wolverine v. The Travelers Indemnity Company

Counsel,

Bradley Lorden is prepared to be deposed on the following 30(b)(6) Topics: 1-2, 11-12, 17, 19-21, 23, 25-26, 28-29, 31-33, and 36-37. John Byl is prepared to be deposed on the following 30(b)(6) Topics: 3-5, 8, 10-13, 15-16, 18-22, and 24.

- For Topic 11, Bradley Lorden will answer questions regarding the timing of and Wolverine's scope of knowledge concerning its receipt of notice of claims from claimants in the underlying actions and "costs" Wolverine has incurred for which it is seeking to recover in this litigation. John Byl will answer questions related to the other part of Topic 11, which asks about Wolverine's "knowledge or understanding of the potential for waste derived or resulting from Wolverine's Tannery in Rockford, Michigan to contaminate the environment or otherwise cause injury or damage to persons or property".
- For Topic 12, Bradley Lorden will address Wolverine's interrogatory responses related to the Pollution Exclusions. John Byl will address questions related to Wolverine's operations as they relate to the Pollution Exclusions.
- For Topic 19, Bradley Lorden will answer questions related to Wolverine's "notice to the Defendants of any request, demand, or claim" that Wolverine "investigate and/or remediate" any PFAS contamination. John Byl will answer questions related to "any request, demand, or claim that [Wolverine] investigate and/or remediate" PFAS contamination and persons with knowledge of Wolverine's investigation and remediation activities.
- For Topic 20, Bradley Lorden will answer questions related to Wolverine's "first awareness of each Underlying Claim" and Wolverine's "former directors, employees, agents, and representatives who were involved in [Wolverine's] response and handling of each Underlying Claim." John Byl will answer questions related to Wolverine's investigation and remediation activities related to PFAS contamination and persons with knowledge of Wolverine's investigation and remediation activities.
- For Topic 21, Bradley Lorden will address generally the nature and "cost of" environmental investigation and remediation activities; John Byl will address the "nature, scope, timing, duration," and "reasons" for environmental investigation and/or remediation activities that have been performed or will be performed, and persons with knowledge of these investigation and remediation activities.

Wolverine reserves its right to object to the scope or topic of Defendants' questions in accordance with the relevant Orders in this case.

Best,
Kelly

Kelly Koss | Associate
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From: Dreher, Kevin <KDreher@btlaw.com>

Sent: Monday, August 7, 2023 3:59 PM

To: Browning, Charles <CBrowning@plunkettcooney.com>

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Subject: RE: Wolverine v. The Travelers Indemnity Company

Chuck – We are preparing an email on that topic and will send to you all by tomorrow.

From: Browning, Charles <CBrowning@plunkettcooney.com>

Sent: Monday, August 7, 2023 3:57 PM

To: Dreher, Kevin <KDreher@btlaw.com>

Cc: Rivera, Ren <KMinnick@plunkettcooney.com>; Winters, Patrick <PWinters@plunkettcooney.com>; Block, Drew <DBlock@plunkettcooney.com>; Seth Jaffe <sjaffe@hww-law.com>; Brent J Graber <bgraber@hww-law.com>; Wayne Karbal <wkarbal@KARBALLAW.com>; Brochert, Stephanie <[sbrechert@plunkettcooney.com](mailto:sbrochert@plunkettcooney.com)>; Moyer, Bradford <BMoyer@plunkettcooney.com>

Subject: [EXTERNAL] Wolverine v. The Travelers Indemnity Company

Caution: This email originated from outside the Firm.

Kevin,

Wolverine's first 30(b)(6) witness, Brad Lorden, is scheduled to be deposed next Wednesday, yet Wolverine still has not identified the topics on which he will be designated to provide testimony. Please provide the topics by 5:00 pm Eastern on August 8, 2023.

Thank you,
Chuck



Charles W. Browning

Plunkett Cooney
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